B. Bolan



WEINBERG RICHMOND RECEIVED

FEB 0 1 2006

U.S. EPA REGION 5 OFFICE OF REGIONAL ADMINISTRATOR 333 WEST WACKER DRIVE #1800 CHICAGO, ILLINOIS 60606-1288 TELEPHONE (312) 807-3800 FACSIMILE [312] 807-3903

> TIMOTHY RAMSEY (312) 845-2507 TRAMSEY@WR-LLP.COM

January 30, 2006



VIA U.S. CERTIFIED MAIL RETURN RECEIPT REQUESTED

Daniel H. Stiehr and Doris D. Stiehr 2860 LaFayette Boulder, Colorado 80303

2430 Wisconsin Company c/o Daniel H. Stiehr and Doris D. Stiehr 2860 LaFayette Boulder, Colorado 80303

2424 Wisconsin Avenue, Downers Grove, Illinois Re: Ellsworth Industrial Park, Downers Grove, Illinois

Dear Mr. and Mrs. Stiehr and 2430 Wisconsin Company:

This letter gives notice that our client Wisconsin Avenue Property, L.L.C., an Illinois limited liability company ("WAP"), 527 Sheridan Road, Waukegan, Illinois 60085, intends to bring suit against you under provisions of the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA") and the Resource Conservation and Recovery Act ("RCRA"), as described in this letter.

Comprehensive Environmental Response, Compensation and Liability Act

Please be advised that pursuant to CERCLA Section 310, 42 U.S.C. 9659, WAP intends to sue you as potentially responsible parties and/or for violations of CERCLA and applicable regulations. Specifically, 2430 Wisconsin Company, an Illinois general partnership, and its general partners including Daniel Stiehr and Doris Stiehr, were the owners or operators of the facility at 2424 Wisconsin Avenue, Downers Grove, Illinois, which is within the Ellsworth Industrial Park at which hazardous substances have been released to soils and/or groundwater. At some prior time, you or your tenants who occupied the facility from approximately January 1, 1978 to approximately June 1, 1997 (including Bison Gear & Engineering Corporation) caused or allowed the release of hazardous substances into soils and groundwater at the facility, or you otherwise fall within the categories of responsible parties set forth in Section 107 of CERCLA, 42 U.S.C. 9607. WAP intends to sue you for all necessary response costs consistent with the National Contingency Plan. WAP may bring actions

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Daniel Stiehr and Doris Stiehr 2430 Wisconsin Company January 30, 2006 Page 2

under CERCLA in 60 days or at any time thereafter and will pursue all applicable remedies and relief under CERCLA.

Resource Conservation and Recovery Act

Please be advised that pursuant to Section 7002 of RCRA, 42 U.S.C. 6972, WAP intends to sue you for violations of RCRA and applicable regulations, and for contributing to conditions which may present an imminent and substantial endangerment to health or the environment. Specifically, you (i) were the owners or operators of the facility at 2424 Wisconsin Avenue, Downers Grove, Illinois during the time period from approximately January 1, 1978 to approximately June 1, 1997 in which hazardous wastes and/or solid wastes were generated and/or disposed of at the facility or otherwise contributed to the contamination and (ii) leased the facility to Bison Gear & Engineering Corporation, which leased this facility from approximately January 1, 1978 to approximately June 1, 1997 and caused or contributed to the contamination through its generation and/or disposal of hazardous wastes and/or solid wastes at the facility. There may be other hazardous wastes, solid wastes or regulated substances which were also released at your property or properties that present or may present an imminent and substantial threat to public health and the environment. Hazardous wastes and/or solid wastes and/or regulated substances have not been properly handled, stored or disposed of pursuant to the requirements of RCRA and the regulations promulgated thereunder. WAP may bring an action pursuant to 42 U.S.C. 6972(a)(1)(A) in 60 days or at any time thereafter and an action pursuant to 42 U.S.C. 6972(a)(1)(B) in 90 days (or at any time thereafter).

Conclusion

Please be advised that any action against you based on these violations of CERCLA and RCRA may be joined with other federal or state statutory or regulatory actions, and with common law actions. If WAP does not reach settlement with you before the notice periods of 60 and 90 days expire, WAP may bring suit against you under CERCLA and/or RCRA in federal court. If you have any questions, or would like to discuss this matter further, please contact me as attorney for WAP.

Thusty Many

cc: Hon. Steven Johnson, Administrator, USEPA

Hon. Thomas V. Skinner, Regional Administrator, USEPA Region V

Hon. Alberto Gonzales, Attorney General, U.S. Department of Justice

Hon. Douglas P. Scott, Director, IEPA

Hon. Lisa Madigan, Attorney General, State of Illinois

Hon. Rod Blagojevich, Governor, State of Illinois

(all via certified mail)

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Daniel Stiehr and Doris Stiehr 2430 Wisconsin Company January 30, 2006 Page 3

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United States Environmental Protection Agency Region V
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Chicago, Illinois 60604-3507

Hon. Alberto Gonzales Attorney General United States Department of Justice 950 Pennsylvania Avenue, N.W. Washington, DC 20530

Hon. Douglas P. Scott Director Illinois Environmental Protection Agency 1021 North Grand Avenue East P. O. Box 19276 Springfield, Illinois 62794-9276

Hon. Lisa Madigan Attorney General State of Illinois 100 West Randolph Street 12th Floor Chicago, Illinois 60601

Hon. Rod R. Blagojevich Governor of the State of Illinois 100 West Randolph Street 16th Floor Chicago, Illinois 60601